

EXHIBIT # 4

1 A. 3 A is a letter talking about his reference of Alan Town 57
2 possibly being able to copyright the book. Also asking for
3 him to give one of the drafts of the book back, which I
4 believe he did.
5 Q. All right. And just go ahead and generally identify, you
6 don't have to necessarily go into the detail.
7 A. 3 B is just an envelope that was sent from Norman. It
8 must have contained something in it.
9 3 D is a letter regarding Ken Atchity, who was an
10 agent that represented me.
11 3 E is just a little letter Norman gave me, Ayn Rand
12 article.
13 3 F is just him saying that he liked it, liked the
14 manuscript.
15 3 C is Ayn Rand little booklet that he sent met.
16 3 G is a letter that he sent to Michelle Lax, who was
17 an attorney at Mehlman and Lax.
18 3 H is a letter to Norman from a lady named
19 Jacqueline Cantor at Dell Publishing Company.
20 3 I is a letter from Norman commenting on the letter
21 from Jacqueline Cantor at Dell.
22 3 J is a letter confirming that he sent a package,
23 which I believe had a contract to an agent in California.
24 3 K is just a letter to Norman.
25 And 3 L is another letter to him about some agent.

1 gave his criticism of it. 59
2 He from at least 1989 intermittently would send the
3 book out to people, that he had contacts with, you know, who
4 they themselves might have contacts in publishing, or they
5 might have known people that had contacts in publishing.
6 Q. When did Mr. Pessin pass away? A. In 1999, I believe.
7 Q. And did you socialize with Mr. Pessin?
8 A. Yes.
9 Q. And describe in very general terms the nature of that
10 aspect of your relationship.
11 A. We were very close. We played tennis together. During
12 the warmer parts of the year, I would see him two or three
13 times per week, probably.
14 Q. Now, let me ask you whether you could take a look at
15 exhibits 7 and 8 and tell us what they are?
16 A. Let's see. Number 7 is a letter to my former criminal
17 attorney in Ohio, and it was regarding a conversation I had
18 with an attorney here in Baltimore named Robert Grossbart, and
19 we had a three-way conversation.
20 And it was basically Robert Grossbart will some
21 contacts in the entertainment business, and he wanted to
22 verify that my story was true, and also we asked Jerry to send
23 us some documents that might help in writing the story.
24 Number 8 is a follow-up letter to that conversation
25 from I believe the secretary to Gerald Messerman. Her name

1 And 3 M is a card from Miriam Pessin, who was 58
2 Norman's wife.
3 Q. Now, could you tell us where you got those documents?
4 A. I had a filing cabinet, and in the filing cabinet was
5 files of anything that had to do with writing, specifically
6 correspondence with people.
7 Q. All right. And how long did you know Mr. Pessin?
8 A. I knew him since 1986, I believe.
9 Q. And how did you come to know him, and what was the nature
10 of your relationship with Mr. Pessin?
11 A. I got to know him, because I had a lawsuit that came out
12 of having a company that did some maintenance at Bonnieview
13 Country Club, and there were some problems with the contract,
14 and I first sought to hire his son who I knew from tennis, but
15 his son couldn't do it because he belonged to Bonnieview or
16 something, so he recommended his father.
17 Q. And did Mr. Pessin perform any other legal services for
18 you?
19 A. Yes, he did. After that case, he represented me in an
20 auto accident. He also represented me with the book.
21 Q. Specifically, what did he do to assist you with the book?
22 A. Well, he -- he certainly talked to me about it a lot. He
23 read it. He advised me of my legal rights about it. I had a
24 question of whether, you know, by making any statements that I
25 did in the book, whether I'd be waiving any privileges. He

1 was Maryann Kuzilla. In it she's just saying Jerry told her 60
2 to send me this stuff that I asked for.
3 Q. Now, tell us, if you would, what role Mr. Grossbart was
4 playing with regard to this matter that you've defined in
5 these two exhibits?
6 A. Well, we knew each other. He did some work for me, and
7 then I also knew him socially from the country club at
8 Bonnieview, and he was -- you know, I said that I was going to
9 write a book, and he intimated to me several times that he
10 might have some contacts that could help me, and he at a
11 certain time I believe it was around when this first letter
12 was written August 15, 1988, that, you know, I told him in
13 confidence the gist of my story, so that he would be able to
14 try to help me market it and develop it.
15 Q. Did you tell him anything about being at Shepherd Pratt?
16 A. Uh-huh.
17 Q. The answer's yes?
18 A. Yes. I told him the basic outline of the entire story.
19 Q. Let me ask you if you could identify again I believe these
20 documents are before you, exhibit 4 A and 4 B.
21 A. Yes.
22 Q. And what are they?
23 A. One is an application for statement of charges against me
24 by Corporal Hughes of the State Police. And the other is a
25 warrant, it's a charging document, and that is the warrant